

<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>DESCRIPTION</u>	<u>BATES RANGE</u>	<u>DATE</u>	<u>PRIVILEGE CLAIMED</u>
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Roland Maldonado	Lynette Harris; Harold Orr; Debbie Fye; George Vaughn; Michael Miller, Susan Morgenstern; Courtney Eller; Katie West	Email string Re analysis of Washington County Article and response to same	CORPRIV000001-9 (CORPRIV000009 is CORIZON007133)	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; George Vaughan	Email Re analysis re: Washington QI	CORPRIV000010	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	Roland Maldonado; Debbie Fye; George Vaughan; Ivor Garlick	Email Re legal advice re: findings of auditor's report	CORPRIV000011-12	November 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Latonya Nicholson	Debbie Fye; Heather Dale; Katie West; Carla Copeland, Dee Dee Bittner	Email Request for Information re: medical providers	CORPRIV000013-14	April 10, 2014	Attorney-Client Privilege; Work-Product Doctrine Irrelevant – predates Pitkin and pertains to physicians not at WA Co. at that time.

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Kim Ives	Katie West; Rebekah Haggard; Harold Orr; Roland Maldonado; George Vaughan; Debbie Fye; Clair Cochran; Heather Dale; Chris Heeg	Email Analysis re: potential Reporting to Oregon Board of Medicine	CORPRIV000015	June 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Kim Ives	Katie West; Beckey Pinney; Roland Maldonado; George Vaughan; Debbie Fye; Harold Orr; Clair Cochran; Heather Dale; Chris Heeg	Email Analysis re: potential Reporting to Oregon Board of Medicine	CORPRIV000016	June 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Britt Heron	Debbie Fye; Katie West; George Vaughan	Email emails string Re: Auditor's report	CORPRIV000017	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	Debbie Fye; George Vaughan	Email string Re Washington County audit	CORPRIV000018-19	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Katie West	Debbie Fye; George Vaughan	Email Re Washington Co Audit	CORPRIV000020-21	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Lynette Harris; George Vaughan; Roland Maldonado; Harold Orr; Ivor Garlick; Katie West; Susan Morgenstern	Email Re Jail health care audit questions	CORPRIV000022	December 2, 2014	Attorney-Client Privilege; Work-Product Doctrine
Dee Dee Bittner	Debbie Fye; Latonya Nicholson; Heather Dale; Katie West; Carla Copeland	Email Re request for information re: medical providers	CORPRIV000023-24 (CORPRIV000024 is CORIZON007136)	April 9, 2014	Attorney-Client Privilege; Work-Product Doctrine Irrelevant – predates Pitkin and pertains to physicians not at WA Co. at that time.
George Vaughan	Katie West; Debbie Fye; Roland Maldonado	Email string Re Washing County Contract Modification Proposal	CORPRIV000025-29 (CORPRIV000028 is CORIZON007138)	June 6, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	George Vaughan	Email string Re: Summarizing communication from outside counsel re audit report	CORPRIV000030-31	May 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	Theresa Brumfield; Dee Dee Bitner; George Vaughan; Debbie Fye	Email string Re legal advice re: Washington County Audit Findings	CORPRIV000032-35	November 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West;	Email string Re Legal analysis and policy re: forced medication	CORPRIV000036-37	March 11, 2015	Attorney-Client Privilege; Work-Product Doctrine Irrelevant
Debbie Fye	Katie West	Email String Re: Draft response to auditor	CORPRIV000038-39	April 11, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Katie West	Debbie Fye; George Vaughan; Jennifer Bishop	Email string Re Amendment to contract with Washington County	CORPRIV000040	September 24, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	George Vaughan; Debbie Fye; Roland Maldonado; Vicki Thomas	Email String Re Washington County Audit	CORPRIV000041-46	April 3, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	George Vaughan; Roland Maldonado; Harold Orr; Ivor Garlick; Katie West	Email string Re staff changes and education at Washington County	CORPRIV000047-48	June 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	George Vaughan; Katie West; Jennifer Bishop	Email string Re Washington County contract proposal	CORPRIV000049	September 17, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; George Vaughan	Email string Re auditor's report	CORPRIV000050-53	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Christy Wyse	Katie West; Debbie Fye; George Vaughan	Email Re information sent to Washington County for discussion re: auditor's report	CORPRIV000054	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Roland Maldonado	George Vaughan; Katie West; Jennifer Bishop; Debbie Fye	Email string Re new amendment to Washington County contract	CORPRIV000055	August 28, 2014	Attorney-Client Privilege; Work-Product Doctrine
Roland Maldonado	Katie West; Scott King; George Vaughan; Michael Miller; Jonathan Walker; Harold Orr	Email string Re Oregonlive.com report	CORPRIV000056-57	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Charles Guffey	Michael Miller; Katie West; George Vaughan; Debbie Fye; Pat Booker	Email string Re contract extension at Washington County	CORPRIV000058-67 (CORPRIV000063 is CORIZON007145)	December 8, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Roland Maldonado; Lynette Harris; Katie West; Harold Orr; George Vaughan; Susan Morgenstern; Courtney Eller	Email string Re Statement re: Washington Audit Report	CORPRIV000068-77	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Courtney Eller	Roland Maldonado; Lynette Harris; Katie West; Harold Orr; Debbie Fye; George Vaughan; Susan Morgenstern; Michael Miller	Email string Re Statement re: Washington Audit Report	CORPRIV000078-81	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	George Vaughan; Debbie Fye	Email String Re request by Washington County for information	CORPRIV000082-87	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale; George Vaughan	Email String Re request by Washington County for information	CORPRIV000088	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Katie West; George Vaughan	Email String Re request by Washington County for information	CORPRIV000089-90	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; George Vaughan	Email String Re request by Washington County for information	CORPRIV000091	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	Debbie Fye; Heather Dale	Email String Request for Information re: medical providers	CORPRIV000092-99	April 9, 2014	Attorney-Client Privilege; Work-Product Doctrine Irrelevant – predates Pitkin and pertains to physicians not at WA Co. at that time.

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Debbie Fye	Katie West; Heather Dale	Email String Re request by Washington County for information	CORPRIV000100 (CORIZON007149)	April 8, 2014	Attorney-Client Privilege; Work-Product Doctrine
Roland Maldonado	George Vaughan; Katie West; Debbie Fye	Email String Re: auditor's report response and draft	CORPRIV000101	November 29, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	George Vaughan; Katie West; Roland Maldonado	Email String Re auditor's report response and draft	CORPRIV000102-115 (CORPRIV000104 is CORIZON007151) (CORPRIV000114 is CORIZON007153)	November 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
		Draft response to Auditor's Report Washington County attached to privileged emails at p. 117-130	CORPRIV000117-122		Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Katie West; George Vaughan	Email string Re draft response to Auditor's report	CORPRIV000123-128	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
George Vaughan	Katie West; Roland Maldonado; Debbie Fye	Email string Re: auditor's report response	CORPRIV000116 (CORIZON007155)	November 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Steve Brown	Roland Maldonado, Britt Herron, Jeff Sholey, Susan Mogenstern; Lynette Haris; James Daigle	Email string Re media contact re: Inmate Madeline Pitkin	CORPRIV000129-130	April 25, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email string Re Written warnings notices to employees	CORPRIV000131-133 (CORPRIV000131 is CORIZON007156)	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	James Daigle	Email Re Corizon Response letter	CORPRIV000134 (CORIZON007165)	May 23, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Dee Dee Bittner; Heather Dale; Katie West	Email string Request for information re: medical providers	CORPRIV000135-136	April 9, 2014	Attorney-Client Privilege; Work-Product Doctrine Irrelevant – predates Pitkin and pertains to physicians not at WA Co. at that time.
Heather Dale	Katie West; Debbie Fye	Email string Re response to request for information from Washington County	CORPRIV000137 (CORIZON007159)	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
Heather Dale	Katie West; Debbie Fye	Email string Re response to request for information from Washington County	CORPRIV000138 (CORIZON007161)	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Heather Dale	Katie West; Debbie Fye	Email string Re response to request for information from Washington County	CORPRIV000139 (CORIZON007163)	April 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
Heather Dale	Katie West; Debbie Fye	Email Request for Information re: medical providers	CORPRIV000140-145	April 9, 2014	Attorney-Client Privilege; Work-Product Doctrine Irrelevant – predates Pitkin and pertains to physicians not at WA Co. at that time.
Debbie Fye	James Daigle;	Email string Re report site visit 5/14/15	CORPRIV000146-148	May 14, 2014	Attorney-Client Privilege; Work-Product Doctrine
Kim Ives	Debbie Fye; Katie West	Email string Re OR Board of Nursing	CORPRIV000149	July 2, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Katie West	Email Re Oregon Board of Nursing	CORPRIV000150	June 27, 2014	Attorney-Client Privilege; Work-Product Doctrine
Roland Maldonado	Debbie Fye; Ivor Garlick; George Vaughan; Katie West	Email string Re OR Board of Nursing and disciplinary actions	CORPRIV000151	June 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Katie West	Debbie Fye	Email string Re call with Board of Nursing	CORPRIV000152	June 26, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re disciplinary actions at Washington County	CORPRIV000153	June 23, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re disciplinary actions at Washington County	CORPRIV000154	June 17, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary actions at Washington County	CORPRIV000155	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000156	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000157	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000158	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000159	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000160	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000161-162	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000163-164	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	Katie West; Heather Dale; George Vaughan	Email Re Disciplinary action at Washington County	CORPRIV000165	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	James Daigle	Email Re Report re: Washington Co	CORPRIV000166	May 30, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	James Daigle	Email Re Report re: Washington Co	CORPRIV000167	May 28, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West	Email Re Report re: Washington County	CORPRIV000168	May 28, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	George Vaughan	Email string Re Report re: Washington County and summarizing legal advice	CORPRIV000169- 170	May 13, 2014	Attorney-Client Privilege; Work-Product Doctrine

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Debbie Fye	James Daigle	Email Re site visit report	CORPRIV000171	May 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West	Email Re: meeting with outside counsel	CORPRIV000172	May 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Roland Maldonado	Debbie Fye; George Vaughan; Ivor Garlick; Harold Orr; Katie West; Jaime Daigle	Email string Re: findings related to Washington County	CORPRIV000173-174	May 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Debbie Fye	Katie West; Heather Dale	Email Re Disciplinary action at Washington County	CORPRIV000175	June 13, 2014	Attorney-Client Privilege; Work-Product Doctrine
Roland Maldondo	Lynette Harris; Harold Orr; Debbie Fye; George Vaughan; Michael Miller; Susan Moregnetern; Courtney Eller; Katie West	Email Re: preparing response to audit findings	CORIZON007133		

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